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PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

FORMER GULF & WESTERN/ BUCKEYE FORGE FACILITY

CLEVELAND, OHIO
OHD 017 721 754

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the former Gulf & Western/Buckeye Forge facility in Cleveland, Ohio. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from the SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in setting priorities among Resource Conservation and Recovery Act (RCRA) facilities.

The former Gulf & Western/Buckeye Forge facility is a vacant facility at 5171 East 71st Street, Cleveland, Cuyahoga County, Ohio. Gulf & Western Manufacturing Company (Gulf & Western) leased the site and operated a steel-forging machine shop there from 1974 to 1983. In 1983, Hugh Schein purchased the steel forging machine shop from Gulf & Western and continued to operate at the 71st Street address under the name of Buckeye Forge, Inc. (Buckeye Forge) until 1989. Buckeye Forge then vacated the 71st Street site and moved its operation to the present site at 11700 Harvard Avenue. The site currently houses an empty warehouse. Excell Tube Manufacturing, a new tenant, will begin operating at the 71st Street address in early 1992.

File information indicates that Gulf & Western submitted a RCRA Part A permit application for treatment, storage, and disposal activities; however, a copy of this permit application was not available. No other information was available about Gulf & Western's facility operations, waste generating procedures, and waste management practices. Wastes managed by Buckeye Forge at the facility included nonhazardous machine lubricants, oils, water-soluble oils, and metal scraps. Currently, no wastes are generated at the site. The PA/VSI identified the following three SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Coolant Oil Trench and Sump
2. Concrete Oil-Drip Pad
3. Drum Storage Area

Areas of Concern

1. Loading Dock

During the PA/VSI, PRC observed a small amount of a dark brown liquid in the trench and sump of SWMU 1 and black oily stains on a brick wall along the length of the concrete oil-drip pad (SWMU 2). Stained gravel and soil also was observed near the northwest corner of the pad where the concrete berm was breached. Black stains on the wall and surrounding soil also were observed at AOC 1. In addition, a storm water drain next to the loading dock contained standing water with an oily sheen. The county combined sanitary/stormwater sewer system stormwater drains leads to the Southerly Water Treatment plant. The Southerly Water Treatment plant is located approximately 0.75 mile northwest of the Buckeye Forge facility. The plant discharges its water to the Cuyahoga River. SWMU 3 was identified during a second VSI conducted on April 20, 1992.

No documented releases of hazardous wastes or hazardous constituents from the former facility were identified during the PA/VSI. The potential for releasing hazardous wastes or hazardous constituents from SWMUs 1, and 3 to ground water, surface water, air, and on-site soil is low. The potential for release to these media is low because the facility is no longer in operation. In addition, there is no indication that hazardous wastes were generated and handled at the facility between 1983 and 1989. It is suspected that hazardous wastes were stored in SWMU 3 before 1983, because Gulf & Western submitted a RCRA Part A permit application for storage of wastes in containers. Little is known about Gulf & Western's waste generation and management.

There has been a release from SWMU 2 to on-site soils as revealed by stained soils near the northwest corner of the drip pad. The potential for SWMU 2 to release hazardous constituents to ground water is low to moderate, depending on the depth to ground water and the permeability of the soils near the pad. The potential for SWMU 2 to release hazardous constituents to surface water is low because the unit is inactive and the releases to on-site soils appeared to have been contained at the unit. Consequently, the potential for the spilled material to migrate to surface water is low. SWMU 2 has a low potential to release hazardous constituents to the air because the material released is suspected to be a non-volatile oil. Volatile constituents may have been present in the material initially; however, because the facility has not been in operation since 1989, any volatile constituents initially present would have dispersed by this time.

There has been a release from AOC 1 to on-site soils as revealed by stained soils in the area. The potential for AOC 1 to release hazardous constituents to ground water is low to moderate depending on the depth to ground water and the permeability of the soils near the dock. The potential for AOC 1 to release hazardous constituents to the surface water is low to moderate. Water with an oily sheen was observed in a storm water drain next to the dock. The county combined sanitary/stormwater sewer system drains to the Southerly Water Treatment plant. The Southerly Water Treatment plant is located approximately 0.75 mile northwest of the Buckeye Forge facility. The plant discharges its water to the Cuyahoga River. AOC 1 has a low potential to release hazardous constituents to the air because the material released is suspected to be a non-volatile oil. Volatile constituents may have been present in the liquid initially; however, because the facility has not been in operation since 1989, any volatile constituents initially present would have dispersed by this time.

The former Gulf & Western/Buckeye Forge facility is located in a mixed residential and industrial area. The facility is within a locked chain link fence. Possible receptors of potential releases of hazardous constituents from the facility include nearby residents located within 1/4 mile and former workers. The nearest surface waters are the Ohio Canal and the Cuyahoga River, both located across Canal Street on the south side of the facility. Several wetlands are located within 2 miles of the facility; the closest wetland is approximately 0.5 mile west of the facility. Ground water in the area is not used for public sources. The city of Cleveland obtains its drinking water from Lake Erie.

PRC recommends removal of the contents of SWMU 1 and sampling of the material to determine the proper disposal method. SWMU 1 also should be inspected for cracks. Soil sampling below SWMU 1 is recommended if cracks are found. PRC also recommends soil sampling around the concrete oil-drip pad (SWMU 2) the loading dock (AOC 1) and sampling of the standing water in the storm-water drain to determine whether a release of hazardous constituents has occurred. Samples from both areas should be analyzed for volatile organic compounds (VOC) and total petroleum hydrocarbons (TPH). PRC recommends that SWMU 3 go thru RCRA closure under the approval of the Ohio EPA.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES IX) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region V.

As part of the EPA Region V Environmental Priorities Initiative, the Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) programs are working together to identify and address RCRA facilities that have a high priority for corrective action, using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of setting priorities among facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential release(s) to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, whether or not the unit was intended to manage solid or hazardous waste.

Units that fall within the definition of a SWMU include:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA usually has exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include an area where wood preservative has dripped, a loading and unloading area, or an area where solvent used to wash large parts has dripped continually onto soils.

An AOC is any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where the possibility of such a release in the future is considered strong.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other information needs to be filled during the VSI

The PA includes a general review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is to:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the former Gulf Western/Buckeye Forge facility in Cleveland, Ohio (OHD 071 721 754). The PA was completed on April 16, 1991. PRC gathered and reviewed information from EPA Region V and Ohio EPA (OEPA) files. The VSI was conducted on September 30, 1991. It included a brief interview with 2 facility representatives

from the Buckeye Forge facility at 11700 Harvard Avenue. Following this interview, a walk-through inspection of the former facility at 5171 East 71st Street was performed. Neither of the facility representatives from Buckeye Forge was present during the walk-through inspection. Two representatives of Excell Tube Manufacturing, the new tenant beginning operation at the facility, were present at the walk-through inspection. Two SWMUs and one AOC were identified at the facility during this VSI. Based on information obtained from telephone conversation with Dan Cicarelli of Buckeye Forge and EPA comments on the draft report, a second VSI was conducted on April 20, 1992. During the second VSI, the drum storage area (SWUM 3) was positively identified and inspected.

PRC completed EPA Form 2070-12, using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 9 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C. File information obtained during the PA is included in Attachment D.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The former Gulf & Western/Buckeye Forge facility is located at 5171 East 71st Street in Cleveland, Ohio, Cuyahoga County (latitude 41°25'N, longitude 81°25'W). The surrounding area is zoned mixed industrial, commercial, and residential. The facility is bordered to the east by an Ohio Power building, to the north by a field of transmission-line towers, to the west by a small unoccupied building, and to the south by Canal Street and the Ohio Canal. The vacant facility occupies approximately 2.5 acres and includes a warehouse, a concrete pad, and a loading dock. Figure 1 identifies the location of the former Buckeye Forge facility. The entrance to the facility is from Canal Street; a locked chain link fence surrounds the site.

2.2 FACILITY OPERATIONS

The former Gulf & Western/Buckeye Forge facility was a steel-forging machine shop operated by Gulf & Western Manufacturing Company (Gulf & Western) between 1974 and 1983. The initial owner of the property at 5171 East 71st Street was Mr. Lou Viny. During its operation at the site, Gulf & Western leased the property from Mr. Viny. In 1983, Gulf & Western sold its operations to Mr. Hugh Schein, who continued to operate the machine shop under the name of Buckeye Forge, Inc. (Buckeye Forge). In 1989, Buckeye Forge moved its machine shop from the 5171 East 71st Street site to a site at 11700 Harvard Avenue (OHD 004 465 274), where its operation continues to this day. In the remainder of this report, "the facility" refers to the former Gulf & Western/Buckeye Forge facility at 5171 East 71st Street.

The 5171 East 71st Street property has been vacant since 1989. Ownership of the property was transferred around 1988 to V.F. Holdings, a holding company operated by Mr. Neil Viny. V.F. Holdings is the current owner of the property. At the time of the VSI, Excell Tube Manufacturing, Inc. was preparing to set up steel tubing operations at the site.

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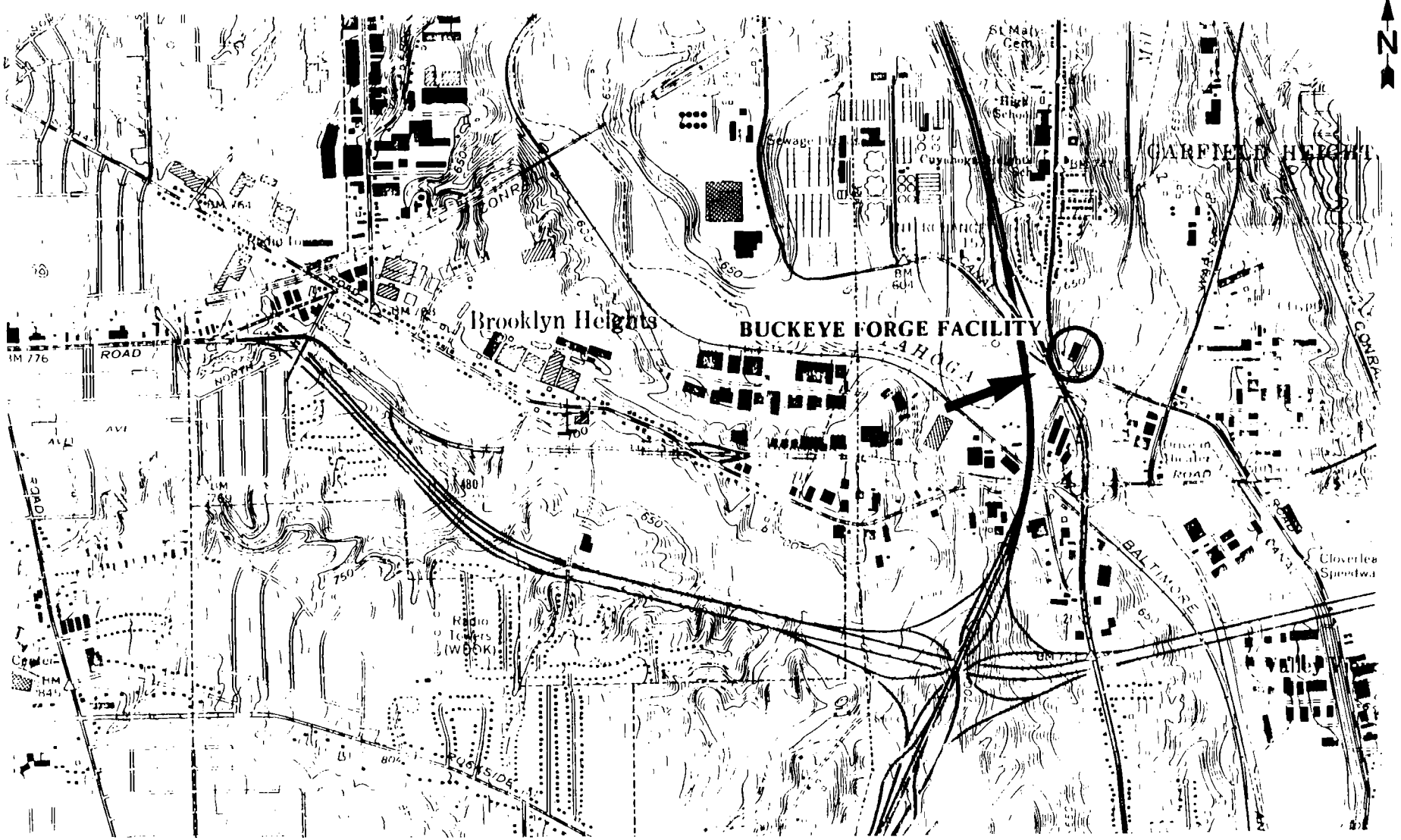


SCALE 1:24,000

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SCALE: 1" = 2,000'

SOURCE: MODIFIED FROM USGS, 1984

FORMER GULF & WESTERN/BUCKEYE FORGE FACILITY
CLEVELAND, OHIO

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

File information related to the facility is extremely limited. Information obtained during the PA is included in Attachment D. Information about Gulf & Western's operations was not available. Attempts to contact former representatives from Gulf & Western were unsuccessful. Information about Buckeye Forge's former operations at the facility is presented below.

Buckeye Forge manufactured eyebolts, yokes, tank flanges, and other steel products. The manufacturing process included forging, drilling, tapping (the process of cutting screw threads into the steel) and threading the raw steel. Manufacturing involved the use of machine lubricants and tapping oils for both cleaning and smooth operation of the machines. Water-soluble synthetic oils were also used as a coolant for machinery. Water-soluble, synthetic oil coolant was circulated through a coolant oil trench and sump (SWMU 1), located along the east and south walls at the north room of the warehouse. The coolant was pumped from the sump into the machines during forging operations and was circulated until spent. Periodically, the spent coolant was pumped out of the sump by Research Oil, taken off site for disposal, and replaced by new coolant. The machine lubricants and tapping oils used in the manufacturing processes drained from hoppers containing products and metal scraps onto a concrete oil drip pad (SWMU 2) located outside the warehouse. The spent lubricants and oils were pumped from the concrete drip pad into drums daily. The drums were stored in a fenced-in drum storage area (SWMU 3) in the northwestern part of the facility, behind the warehouse. Research Oil periodically pumped out the drums and took the waste off site for disposal (Branum, 1991, Cicarelli, 1991). Table 1 lists the SWMUs identified at the former facility and indicates their current status.

No diagram of the facility layout was available; a general description follows. The warehouse is oriented north to south, with the front facing south on Canal Street. The warehouse has been divided into two large rooms by concrete walls. The south room, toward the front of the building, contains office space. The north room, the former operations area, contains SWMU 1, the trench and sump. The trench abuts the east and south walls of the north room. The north room is approximately 120 feet wide and approximately 60 feet deep. The sump is located in the southeast corner of the north room. A 15 x 20-foot concrete pad, SWMU 2, abuts the outside west wall of the warehouse near the northwest corner of the building. It is bordered by a 2-inch tall berm which borders the north, west, and south edges of the pad. The berm is concrete and is part of the concrete pad. The loading dock abuts the outside north wall of the warehouse. The drum storage area (SWMU 3) was located in the northwestern part of the facility, behind the warehouse.

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Coolant Oil Trench and Sump	No	Inactive
2	Concrete Oil Drip Pad	No	Inactive
3	Drum Storage Area	Yes**	Inactive

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B Permit application.

** Suspected unit based on former facility operations. Although file information indicates Gulf & Western submitted a RCRA Part A permit application, a copy of this application was not available.

2.3 WASTE GENERATING PROCESSES

No information was available about Gulf & Western's waste generating and management practices. Although file information indicates that Gulf & Western submitted a RCRA Part A permit application, a copy of this application has not been found. Attempts to contact representatives from the former Gulf & Western facility have been unsuccessful. Information about the wastes generated during Buckeye Forge's operations is presented below.

Table 2 lists the solid wastes generated at the facility, their sources, and the units in which they were managed. The wastes generated were nonhazardous machine lubricants, oils, water-soluble oils, and metal scraps. Waste lubricants and oils were drained from the hoppers containing the products and metal scraps onto the concrete pad and were pumped into drums daily. Research Oil periodically pumped out the drums and took the waste off site for disposal. Spent water-soluble synthetic coolant oil contained in the trench and sump was pumped out periodically by Research Oil and taken off site for disposal (Branum, 1991, Cicarelli, 1991). Metal shavings and scraps were stored in hoppers located outdoors on the concrete pad. They were sent to a scrap yard.

2.4 HISTORY OF DOCUMENTED RELEASES

PRC found no documented releases of hazardous wastes or hazardous constituents from this facility.

2.5 REGULATORY HISTORY

The file information obtained during the PA on the facility is very limited. A RCRA Part A Permit application for this facility was missing from the EPA and OEPA files that PRC obtained. In September 1991, PRC conducted a second search of EPA and OEPA files (those of both the Northeast District Office and the Central Office). PRC found no additional information. Information obtained during the PA is included in Attachment D.

Correspondence between EPA and the facility owner/operator reveals that Gulf and Western submitted a RCRA Part A Permit application before 1981 (application not found during file review). In 1981, Gulf and Western submitted a request to EPA for withdrawal of its RCRA Part A Hazardous Waste Permit application (EPA, 1984). EPA responded by asking Gulf and

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Waste Oil/Lubricants	Forging Process	SWMUs 2 and 3
Water-soluble Oil	Forging Process	SWMU 1
Metal Scraps	Forging Process	SWMU 2

* Primary management unit refers to the SWMU that currently manages or formerly managed the waste.

Western to provide additional information to support Gulf & Western's request for withdrawal. EPA also indicated that Gulf & Western appeared to qualify as a small-quantity generator (EPA, 1984). In January 1985, Buckeye Forge submitted a letter to EPA confirming that Buckeye Forge qualified as a small-quantity generator. In the same letter, Buckeye Forge rescinded its request for withdrawal of its RCRA Part A Permit application. The information gathered during the PA/VSI does not reveal whether EPA acknowledged Buckeye Forge's status as a small-quantity generator. No other information about Buckeye Forge's request for withdrawal of the facility's Part A Permit application was available.

On December 9, 1988, representatives of OEPA conducted a RCRA site inspection of the Buckeye Forge facility. OEPA determined that Buckeye Forge was generating no hazardous waste at that time (OEPA, 1988a,b).

Buckeye Forge is no longer operating at the facility. During the VSI, representatives from Excell Tube Manufacturing indicated they soon would be manufacturing steel tubing at the site.

No information was obtained on any Clean Water Act National Pollutant Discharge Elimination System or air permits for the Buckeye Forge facility during the PA/VSI.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Buckeye Forge facility.

2.6.1 Climate

Average temperatures in Cleveland range from a low of 26 degrees (°) Fahrenheit (F) in January to a high of 72°F in July. In summer, northern areas nearest Lake Erie are markedly colder that the rest of the area. Precipitation is well distributed during the year. Average annual precipitation is 35.4 inches, and the intensity of a 1-year, 24-hour rainfall is 2 inches. Average annual net precipitation is approximately 5.4 inches. From late fall through winter, snow squalls are frequent and total snowfall normally is heavy. Of the total annual precipitation, 60 percent usually falls between April and September. Average relative humidity in mid-afternoon is 60 percent, and the average humidity at dawn is 80 percent. The relative humidity is higher at night than during the daylight hours. The percentage of sunshine is 70 percent in summer and 30

percent in winter. The prevailing wind direction is south ten months during the year. Average wind speed is highest, 13 miles per hour, in January (National Oceanic and Atmospheric Administration, 1990).

2.6.2 Flood Plain and Surface Water

Surface waters at the site appear to drain to the Cleveland storm-water system. The nearest surface waters are the Ohio Canal and the Cuyahoga River. The Ohio Canal and Cuyahoga River run parallel to each other, southeast to northwest; they ultimately join Lake Erie. The rivers are closest to the facility when they run parallel to and just south of Canal Street, which is on the south side of the facility. Because of their southeast to northeast direction the rivers also lie west of the facility at distances ranging from 0.25 to 0.5 miles.

There are several wetlands within 2 miles of the facility. Two wetlands that are classified as palustrine with shrub-scrub and emergent vegetation are located approximately 0.5 and 1.0 mile west of the facility. A third wetland, classified in the same manner, lies approximately 1.5 miles northwest of the facility and just north of the gravel pit shown in Figure 1. Three more wetlands, classified as palustrine, open water, lie northwest and southeast at distances ranging from 1 to 2 miles from the facility. There are also several riverine, open water wetlands that lie along the edges of the Ohio Canal and Cuyahoga River at distances ranging from 0.5 to 2.0 miles from the facility (U.S. Department of Interior, Fish and Wildlife Service, 1977). A sewage treatment plant is located approximately 0.5 mile northwest of the facility.

2.6.3 Geology and Soil

Site specific geology information was not available; therefore, regional information is presented. The exposed rocks of the area are of sedimentary origin and range in age from Late Devonian to Pleistocene. They fall into two general classes: indurated stratified rocks of Late Devonian and early Carboniferous age, and unconsolidated surficial deposits of Pleistocene age. The surficial deposits consist mainly of Pleistocene glacial and lacustrine deposits and Recent alluvium. These Pleistocene deposits form a blanket ranging in thickness from 0 to 440 feet. The indurated rocks underlie the Pleistocene deposits and crop out in the beds and gorges of streams, quarries, and other excavations. The total thickness of Paleozoic strata exposed in this area is about 750 feet. These beds consist of shale, sandstone, and conglomerate of Late Devonian, Early Mississippian, and Early Pennsylvanian age (Cushing, 1931).

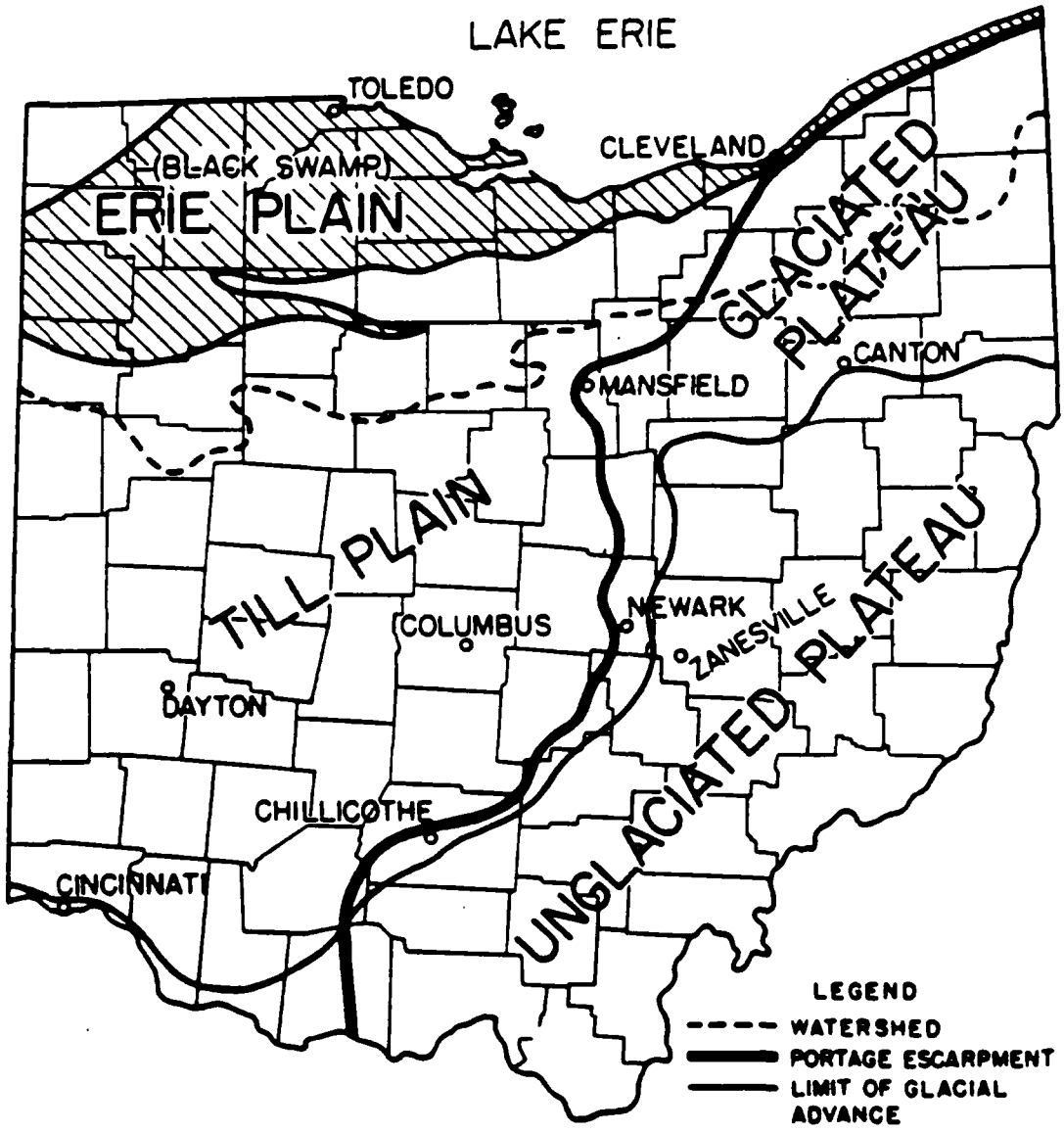
Figure 2 illustrates the physiographic boundary lines in Ohio. Figure 3 illustrates the geologic features of the Cleveland area. As these figures illustrate, thicknesses of weak shale mark the surface of the Appalachian Plateau (depicted as Plateau on Figure 3) and the two lesser platforms (depicted as Till Plain and Lake Plain on Figure 3) on the slope of the Portage Escarpment. The uppermost formation is the Sharon conglomerate, of Lower Pennsylvanian age. It is the youngest exposed Paleozoic rock in this area and is the capstone formation of the plateau across northeastern Ohio. Below the Sharon conglomerate, other formations include: the Orangeville and Meadville shales from the Mississippian age; the Cleveland and Bedford shales, classed by some as Upper Devonian and by others as Lower Mississippian age; and the Chagrin shale of late Upper Devonian age. Figure 4 shows these rocks as they appear in the area below Cleveland (Cushing, 1931).

Exposed rocks are underlain by large thicknesses of Devonian, Silurian, and Ordovician formations, and presumably by Cambrian formations also, resting on a floor of Precambrian crystalline rocks. Figure 4 shows the approximate thickness of each formation found in the Cleveland area (Cushing, et al, 1931).

The soils of the area around the former facility are not readily discernible because of artificial obstacles. The soil association of this area is called Urban land. These are nearly level to gently sloping areas predominantly covered by buildings, structures, concrete, asphalt, and other impervious surfaces. Urban land soils occur mainly in downtown business districts and in corridors along main roads and streets. This soil association makes up about 5 percent of the county. Such soils are about 80 percent Urban land and 20 percent soils of minor extent. Minor soils in these areas consist of Mahoning, Mitiwanga, Elnora, Oshtemo, and Allis soils. Some areas contain such miscellaneous materials as dredgings and industrial wastes (U.S. Soil Conservation Service, 1981).

2.6.4 Ground Water

Specific information about the ground water beneath the site was not available. A general description of ground water for the area surrounding the site follows. In the glacial drift, there are many alternations of sand and gravel with clay that are capable of storing large amounts of water. The contact of the glacial drift with the underlying Bedford, Orangeville, and Meadville shales is also a source of water, especially where the drift is thick and consists largely of sand and gravel. There are also water-bearing sandstone strata within the Cleveland, Chagrin, and



SCALE NOT AVAILABLE

Source: [illegible] 1940

FORMER GULF & WESTERN/BUCKEYE FORGE FACILITY
CLEVELAND, OHIO

FIGURE 2
PHYSIOGRAPHIC BOUNDARY LINES IN OHIO

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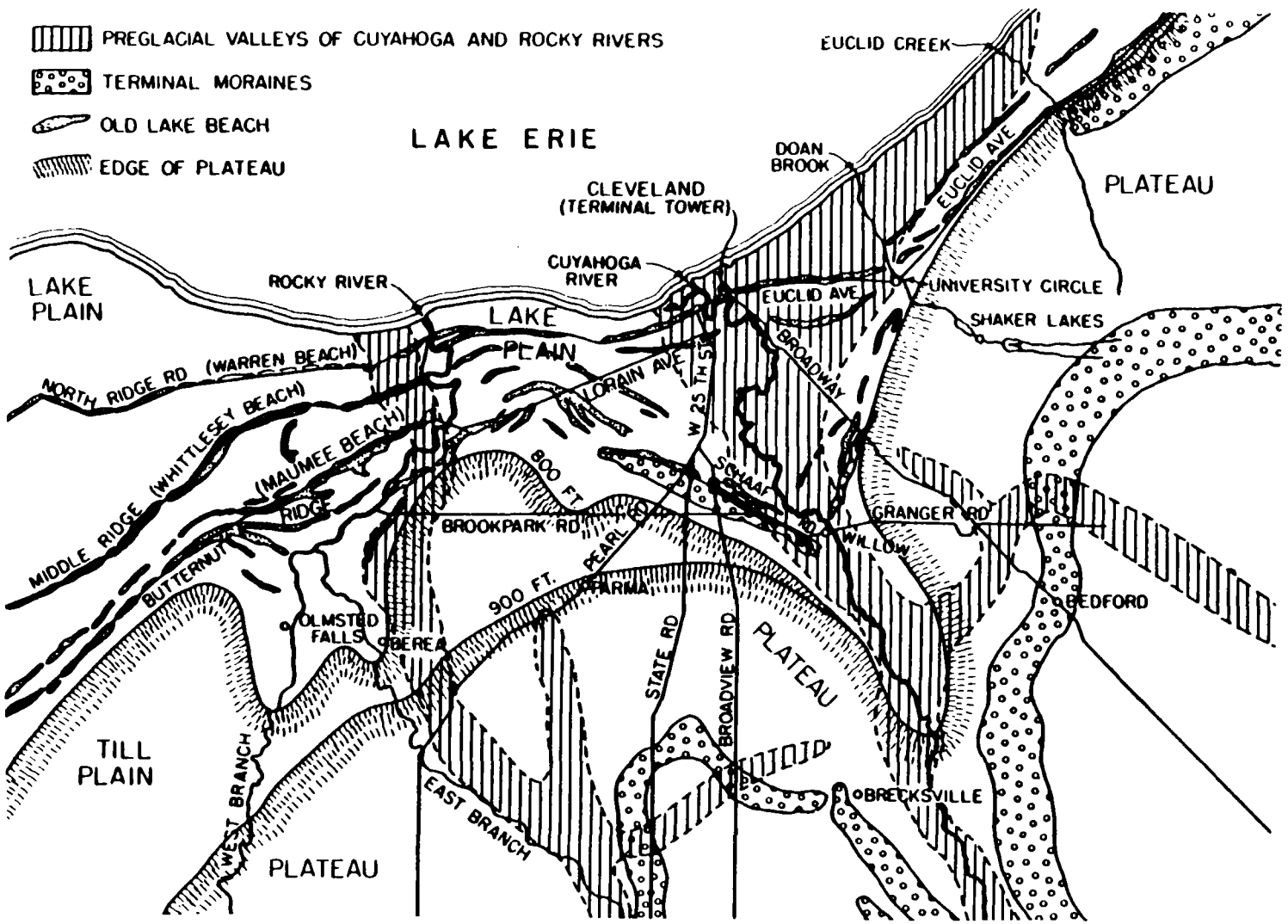

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Source: Modified from Williams, 1940

FORMER GULF & WESTERN/BUCKEYE FORGE FACILITY
CLEVELAND, OHIO

FIGURE 3

GEOLOGICAL FEATURES OF THE CLEVELAND AREA

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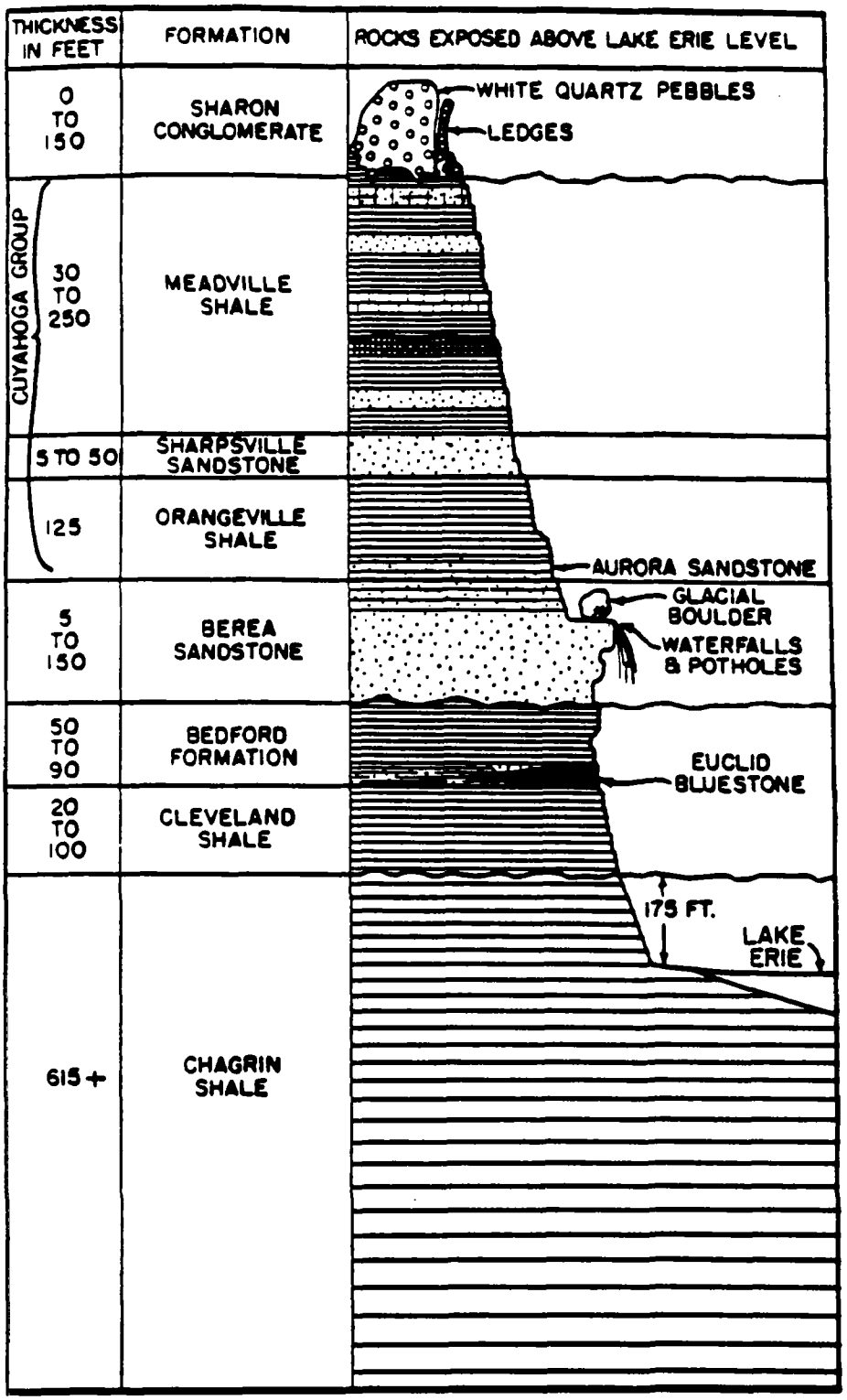

Source: Modified from Williams, 1940

FORMER GULF & WESTERN/BUCKEYE FORGE FACILITY
CLEVELAND, OHIO

FIGURE 4

REPRESENTATIVE GEOLOGIC CROSS-SECTION OF THE CLEVELAND AREA

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underlying shales of Portage age (Cushing, 1931); however, the immediate area around the facility is underlain largely by Bedford, Cleveland, and Chagrin shales that contain very little or no potable water (Schmidt, 1954).

Based on the topographic relief gradient, the ground-water flow is expected to be southeast to northwest. The ground-water flow rate is undetermined; however, it is expected to be very slow, based on the soil and features identified at or near the facility. The depth to the water table in the Lake Plain area averages approximately 4 to 7 feet below the surface, usually observed at the interface between unconsolidated sediments and bedrocks (ES, 1990).

2.7 RECEPTORS

The former facility is located in a mixed industrial and residential area in Cleveland, Ohio. The nearest residences are located to the north and west less than 1/4-mile from the facility. There are also schools and churches within 1-mile of the facility. The vacant facility occupies approximately 2.5 acres and includes an empty warehouse, a loading dock, and a bare concrete pad. The property is surrounded by a locked fence.

Ground water in the area is not used for drinking water. The city of Cleveland obtains its drinking water from Lake Erie. Cleveland has a population of approximately 527,000.

The nearest surface waters are the Ohio Canal and the Cuyahoga River, both located across Canal Street on the south side of the facility. There are no known commercial uses of the Ohio Canal.

There are several wetlands within 2 miles of the facility. Two wetlands that are classified as palustrine with shrub-scrub and emergent vegetation are located approximately 0.5 and 1.0 mile west of the facility. A third wetland, classified in the same manner, lies approximately 1.5 miles northwest of the facility and just north of the gravel pit shown in Figure 1. Three more wetlands, classified as palustrine, open water, lie northwest and southeast at distances ranging from 1 to 2 miles from the facility. There are also several riverine, open water wetlands that lie along the edges of the Ohio Canal and Cuyahoga River at distances ranging from 0.5 to 2.0 miles from the facility (U.S. Department of Interior, Fish and Wildlife Service, 1977).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 3 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC observations.

SWMU 1	**Coolant Oil Trench and Sump**
Unit Description:	This unit consists of a concrete trench that runs along the east and south walls of the north room. The trench is approximately 8 inches deep and 5 inches wide. It drains into a sump located in the southeast corner of the operations room. The sump is approximately 6 x 3 by 6-ft deep. The trench and sump are covered by metal plates.
Date of Startup:	1974
Date of Closure:	The unit ceased operation in 1989.
Wastes Managed:	The trench and sump were used to hold water-soluble coolant oil used in the forging machines. Coolant oil was circulated through the trench; into the sump and machines; and returned to the trench. It was reused until spent. Spent coolant periodically was pumped out of the sump by Research Oil and taken off site for disposal.
Release Controls:	The coolant was contained in a concrete trench and sump. The building acted as secondary containment.
History of Documented Releases:	No documented releases of hazardous waste or hazardous constituents were identified during the PA/VSI.
Observations:	The trench contained a small amount of a dark brown liquid, approximately 1 inch deep. The sump also contained a similar liquid of undetermined depth. There was a dark, oily stain on the outside brick wall behind the sump. Photographs 1, 2, 3, 4, and 5 depict the unit.
SWMU 2	**Concrete Oil-Drip Pad**
Unit Description:	This unit consists of a 15 x 20 ft concrete pad with a 2-inch high berm around the perimeter. Hoppers containing products and metal scraps covered with lubricants and oils were placed on the concrete pad. Lubricants and oils were allowed to drain onto the pad. The waste oils and lubricants were pumped into drums daily.
Date of Startup:	1974

Date of Closure:	The unit ceased operation in 1989.
Wastes Managed:	The unit managed metal scraps, waste oils, and lubricants.
Release Controls:	The waste oils and lubricants were contained by the concrete pad and berm.
History of Documented Releases:	No documented releases of hazardous wastes or hazardous constituents were identified during the PA/VSI.
Observations:	Some areas of black staining were observed on the north wall of the warehouse, adjacent to the concrete pad. The pad did appear to have some cracks. It is unknown if the cracks were just on the surface or if they penetrated the entire thickness of the pad. The berm in the northwest corner of the pad was broken. Gravel and soil near this corner were stained, indicating a release had occurred. A vent also was observed above the pad. It is unknown what the vent was used for in the past. This vent could not be a potential source of air emissions, since the facility is no longer operating. Photographs 6 8, and 9 depict the unit.
SWMU 3	**Drum Storage Area**
Unit Description:	This unit was positively identified and inspected during a second VSI conducted on April 20, 1992. The unit consisted of a fenced, locked, outside storage area with a concrete base. The unit is located on the northwest side of the facility. Photograph 10 depicts the unit. Drums of waste oils and lubricants pumped from the concrete oil-drip pad were stored inside the fenced area. The waste oils and lubricants periodically were pumped out of the drums by Research Oil and taken off site for disposal.
Date of Startup:	1974
Date of Closure:	The unit ceased operation in 1989. The unit was not RCRA closed.
Wastes Managed:	The unit managed waste oils and lubricants. It is also suspected that this unit managed hazardous wastes in drums. Gulf & Western submitted a RCRA Part A permit application in 1980 for storage of hazardous waste in containers. No additional information about the wastes managed by Gulf and Western was available.
Release Controls:	The unit consisted of a concrete pad located outside. The pad did not have a berm or secondary containment around the perimeter at the time of the VSI. When the unit was active, the waste oils and lubricants were contained in drums within a locked and fenced area of the site (Cicarelli, 1991b).

History of Documented Releases: No documented releases of hazardous wastes or hazardous constituents were identified during the PA/VSI.

Observations: The unit was identified during a telephone conversation with an employee of Buckeye Forge (Cicarelli, 1991b). The unit was inspected during a second VSI conducted on April 20, 1992. The fencing surrounding the unit was not present. The unit appeared in good condition with no evidence of releases of hazardous constituents to surrounding media. Photograph 10 depicts the unit.

4.0 AREAS OF CONCERN

PRC identified 1 AOC during the PA/VSI. It is discussed below.

AOC 1 **Loading Dock**

This unit consisted of a loading dock on the north side of the warehouse. During the VSI, PRC observed black stains on the wall and in the soils in the immediate area. The loading dock was used as a ramp for moving materials and products to and from the building and trucks. A storm water drain, is located in the driveway of the loading dock. Water with a slight oil sheen was observed in the storm water drain during the VSI. The county combined sanitary/stormwater sewer sytem drains to the Southerly Water Treatment plant. The Southerly Water Treatment plant is located approximately 0.75 mile northwest of the Buckeye Forge facility. The Southerly Wastewater Treatment facility discharges to the Cuyahoga River. Photographs 11 and 12 depict the area.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified three SWMUs and one AOC at the Buckeye Forge facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3 summarizes the SWMUs and AOC at the Buckeye Forge facility and suggests further action.

SWMU 1 **Coolant Oil Trench and Sump**

Conclusions: The unit has a low potential for release of hazardous wastes and hazardous constituents to ground water, surface water, air, and on-site soils. This potential is low because the unit currently is not operational and is contained within a building with a concrete floor. The walls and floor of the building act as secondary containment. It does not appear that actual releases have occurred from the unit.

Recommendations: PRC recommends that the contents of the trench and sump be sampled to determine the proper disposal method. Samples should be analyzed for volatile organic compounds (VOC) and total petroleum hydrocarbons (TPH). The contents also should be removed and disposed of in an approved manner. In addition, the trench and sump should be cleaned and examined for cracks and any indication of leaks. If cracks are found, soil sampling below the unit is recommended.

SWMU 2 **Concrete Oil-Drip Pad**

Conclusions: There has been a release from SWMU 2 to on-site soils as revealed by stained soils near the broken northwest corner of the pad. The potential for SWMU 2 to release hazardous constituents to ground water is low to moderate depending on the depth to ground water and the permeability of the soils near the pad. The potential for SWMU 2 to release hazardous constituents to surface water is low because the unit is inactive and the release to on-site soil appears to have been contained at the unit. Consequently, the potential for the spilled material to migrate to surface water is low. SWMU 2 has a low potential to release hazardous constituents to the air because the material released is suspected to be a non-volatile oil.

TABLE 3

SWMU AND AOC SUMMARY

	SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1.	Coolant Trench and Sump	1974 - 1989	None	Sample contents for VOCs and TPH; remove and dispose of contents; clean unit and observe for cracks. Soil sampling below unit should be done if cracks are found.
2.	Concrete Oil-Drip Pad	1974 - 1989	Stains on wall and on soils near the break in the concrete berm.	Sample soil around the pad for VOCs and TPH.
3.	Drum Storage Area	1974 - 1989	None	RCRA closure should be implemented with the approval of the Ohio EPA.
	AOC			
1.	Loading Dock	1974 - 1989	Dark brown stains in soil; oil sheen on water in nearby drain	Sample soils in the area; sample standing water in the drain. Analyze samples for VOCs and TPH.

Recommendations: Because of the broken berm and staining of on-site soils and the wall of the warehouse, PRC recommends sampling the soil around the pad to determine if a release of hazardous constituents has occurred. Samples should be analyzed for VOCs and TPH.

SWMU 3 **Drum Storage Area**

Conclusions: The unit has a low potential for release of hazardous wastes or hazardous constituents to ground water, surface water, air, and on-site soils. The potential is low because the unit currently is not used to store wastes and is situated on a concrete pad. No releases of hazardous constituents from this unit were identified.

Recommendations: PRC recommends that the unit be RCRA closed under the approval of the Ohio EPA.

AOC 1 **Loading Dock**

Conclusions: There has been a release from AOC 1 to on-site soils as revealed by stained soils in the area. The potential for AOC 1 to release hazardous constituents to ground water is low to moderate depending on the depth to ground water and the permeability of the soils near the dock. The potential for AOC 1 to release hazardous constituents to the surface water is low to moderate. Water with an oily sheen was observed in a storm water drain next to the dock. The county combined sanitary/stormwater sewer system stormwater drains leads to the Southerly Water Treatment plant. The Southerly Water Treatment plant is located approximately 0.75 mile northwest of the Buckeye Forge facility. The plant discharges its water to the Cuyahoga River. AOC 1 has a low potential to release hazardous constituents to the air because the suspected material released is a non-volatile oil.

Recommendations: PRC recommends soil sampling near the loading dock area and sampling of the standing water in the storm-water drain to determine whether hazardous constituents have been released to the soils and surface water.

REFERENCES

Cushing, H.P., Frank Leverett, and Frank R. Van Horn, 1931. Geology and Mineral Resources of the Cleveland District, Ohio. U.S. Geological Survey Bulletin 818.

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Cicarelli, Dan, 1991. Telephone conversation between Mr. Cicarelli, Buckeye Forge (216/295-2750) and Deborah Lyne, PRC (October 23; November 7).

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OEPA, 1988b. RCRA Interim Status Inspection Form (December 9).

PRC Environmental Management, Inc. (PRC), 1991. Visual Site Inspection (September 30).

Schein, Hugh, 1991. Telephone conversation between Mr. Schein, Buckeye Forge (216/295-2750) and Deborah Lyne, PRC (October 23).

Schmidt, James J., and Alfred C. Walker, 1954. The Ground-Water Resources of the Areas in the Vicinity of the Interchanges of the East-West Ohio Turnpike. State of Ohio Department of Natural Resources Information Circular No.5.

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U.S. Geological Survey, 1974, Flood Prone Area Maps.

USGS, 1984. Topographic map, Cleveland South Quadrangle, Cuyahoga County, Ohio.

U.S. Soil Conservation Service, 1981. Soil survey of Cuyahoga County, Ohio.

U.S. Department of Interior, Fish and Wildlife Service, 1977, National Wetlands Inventory, Cleveland South Quadrangle, Cuyahoga County, Ohio.

Viny, Neil, 1991. Telephone conversation between Mr. Viny, V.F. Holdings (216/447-0070) and Deborah Lyne, PRC (October 23).

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	OHD017721754

II. SITE NAME AND LOCATION

01 SITE NAME *(Legal, common, or descriptive name of site)*	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER				
Buckeye Forge (Former)	5171 East 71St Street				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Cleveland	OH	44125	Cuyahoga	035	21
09 COORDINATES: LATITUDE	**LONGITUDE**				
41 25	81 38				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*
North on Highway 77 to Harvard Avenue Exit East. Left onto E. 71St Street to intersection with Canal road.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
VH Holdings (Neil Viny)	6200 Rockside Woods Blvd		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Independence	OH	44131	216 447-0070
07 OPERATOR *(If known and different from owner)*	**08 STREET *(Business, mailing, residential)***		
Buckeye Forge, Inc	11700 Harvard Avenue		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**
Cleveland	OH	44125	216 295 2750

13 TYPE OF OWNERSHIP *(Check one)*
☒ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency Name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER _____ (Specify) ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*
☐ A. RCRA 3010 DATE RECEIVED: ___/___/___ MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: ___/___/___ MONTH DAY YEAR ☒ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
☒ YES DATE 9/30/91 ☐ NO
BY *(Check all that apply)*
☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*
CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS *(Check one)*
☐ A. ACTIVE ☒ B. INACTIVE ☐ C.UNKNOWN

03 YEARS OF OPERATION
1974 BEGINNING YEAR | 1989 ENDING YEAR ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Waste oils, lubricants, metal scraps, water soluable oil coolant

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
Potential hazard to environment and surrounding population is low. Site is no longer in operation and no hazardous wastes were managed. Operations resulting in waste generation were either conducted indoors or were confined to a bermed concrete pad.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*
☐ A. HIGH *(Inspection required promptly)* ☒ B. MEDIUM *(Inspection required)* ☐ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Deborah Lyne		PRC-EMI	703 883-8408	11/1/91 MONTH DAY YEAR

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

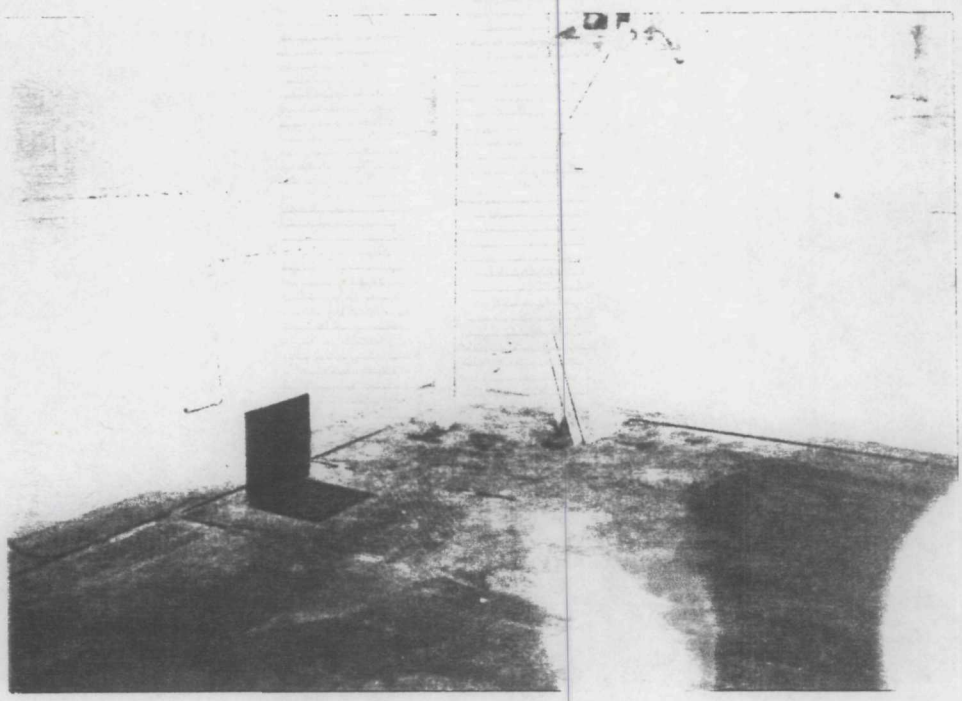
FORMER GULF & WESTERN/BUCKEYE FORGE FACILITY
CLEVELAND, OH
OHD 017 721 754

Date:	April 20, 1992
Inspection Team:	Tom Sinski, PRC Environmental Management, Inc. Shoaib Mahmud, PRC Environmental Management, Inc.
Photographer:	Tom Sinski
Weather Conditions:	Partly sunny, 70° F
Summary of Activities:	The VSI began at 1:50 p.m. There were no facility or site representatives present. The PRC inspection team reinspected SWUM 2. SWMU 3, the drum storage pad was positively identified and inspected. Photographs were taken of SWMU 2 and SWMU 3. The VSI was completed at 2:23 p.m.

VISUAL SITE INSPECTION SUMMARY

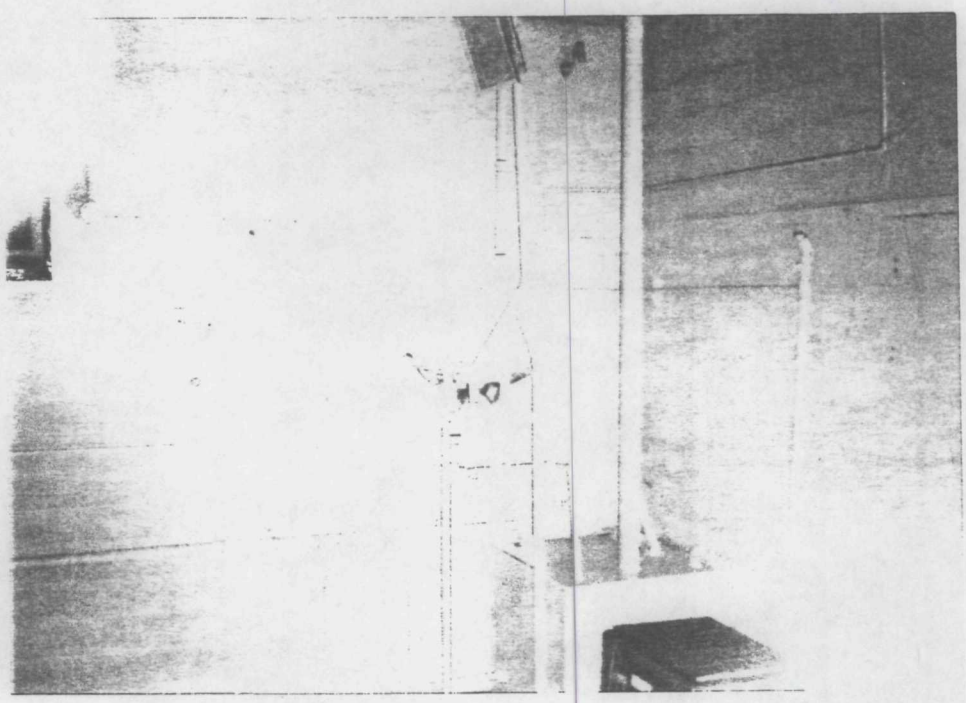
FORMER GULF & WESTERN/BUCKEYE FORGE FACILITY
CLEVELAND, OH
OHD 017 721 754

Date:	September 30, 1991
Facility Representatives:	Harry Schein, Buckeye Forge (216) 295-2750 Larry Branum, Buckeye Forge (216) 295-2750
Site Representatives:	Brian Finaro, Excell Tube Manufacturing Company Milan Sucha, Excell Tube Manufacturing
Inspection Team:	Tom Sinski, PRC Environmental Management, Inc. Steve Tsadwa, PRC Environmental Management, Inc.
Photographer:	Steve Tsadwa
Weather Conditions:	Sunny, 80°F
Summary of Activities:	The visual site inspection began at 9:30 a.m. at the Buckeye Forge 11700 Harvard Avenue facility. PRC's inspection team met Hugh Schein and Larry Branum of Buckeye Forge. Tom Sinski discussed the purpose of the VSI. There was some confusion over the proper identification number for the facility. Tom Sinski called Paul Anderson of OEPA, who said that the identification number pertained to the 71st Street location that was vacated by Buckeye Forge in 1989. The PRC inspection team met with Brian Finaro and Milan Sucha of Excell Tube Manufacturing at 5171 East 71st Street at 11:15 a.m. Tom Sinski discussed the purpose of the VSI. The PRC team inspected all SWMUs and AOCs. Photos were taken of all identified SWMUs; they are included in the following pages. The VSI was completed at approximately 12:00.



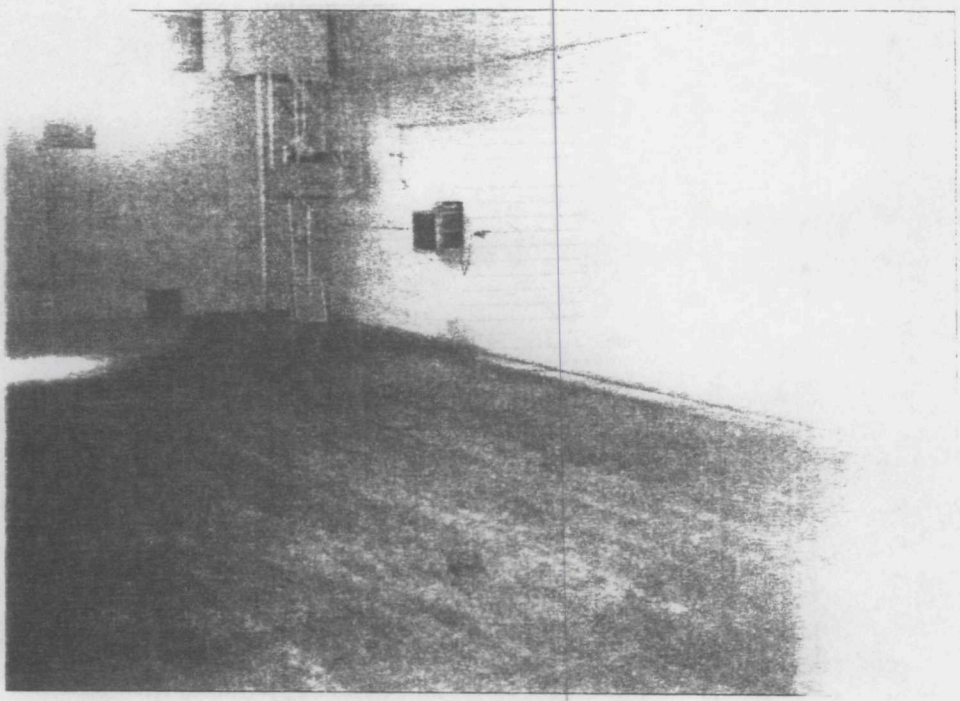
Photograph No. 1
Orientation: Southeast
Description: This photograph shows the metal covering on the coolant sump.

Location: SWMU 1
Date: September 30, 1991



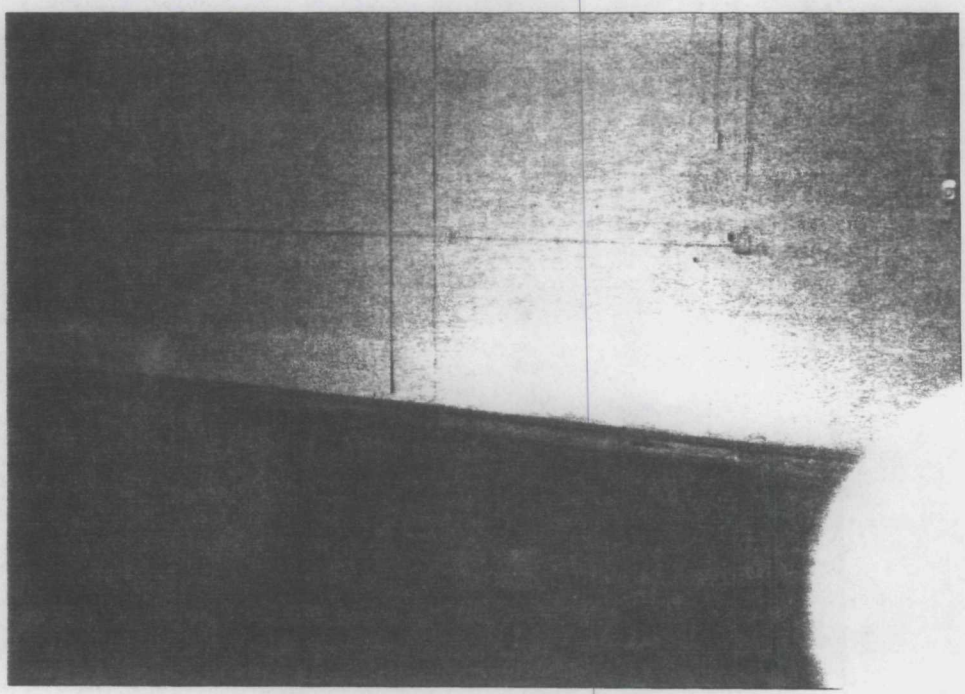
Photograph No. 2
Orientation: Southeast
Description: This photograph shows the piping remaining from the pump for the coolant.

Location: SWMU 1
Date: September 30, 1991



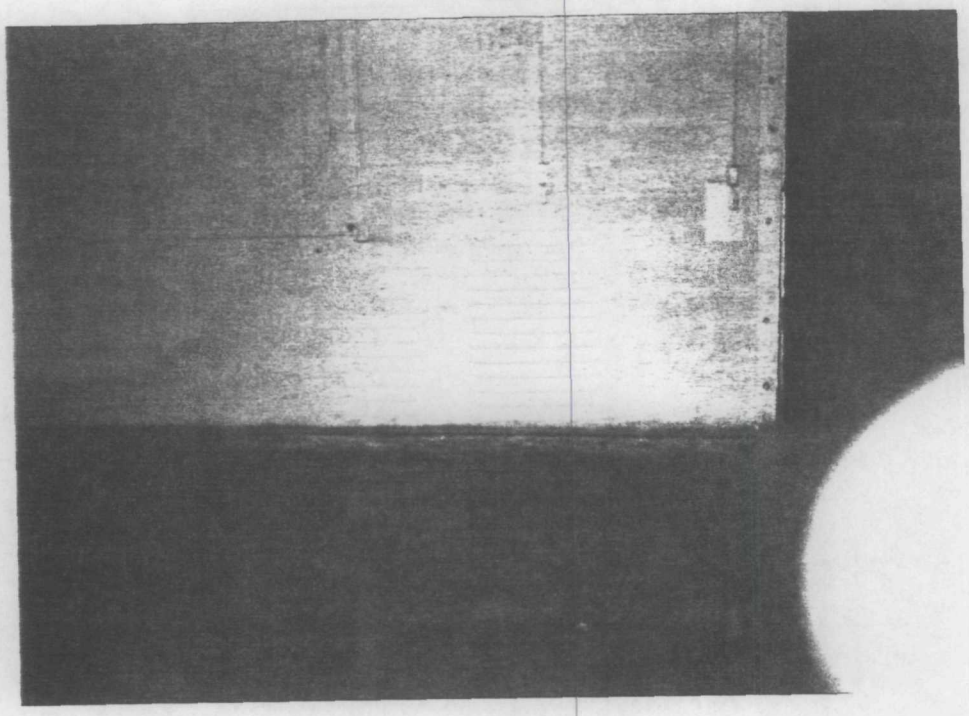
Photograph No. 3
Orientation: Northeast
Description: This photograph shows the metal plates covering the coolant trench.

Location: SWMU 1
Date: September 30, 1991



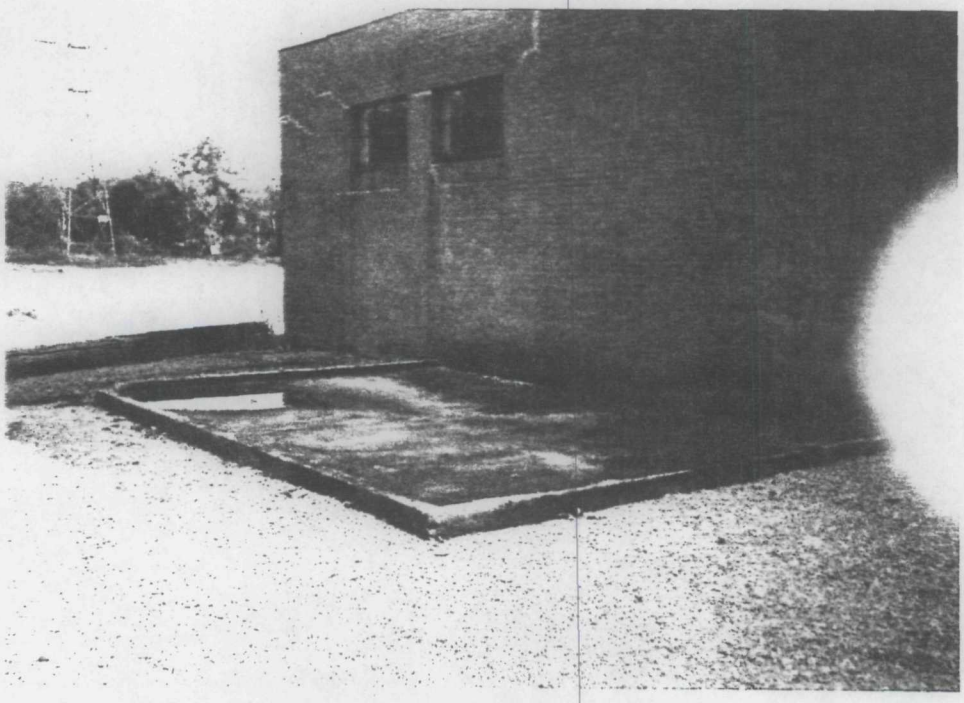
Photograph No. 4
Orientation: East
Description: This photograph shows the metal plates covering the coolant trench.

Location: SWMU 1
Date: September 30, 1991



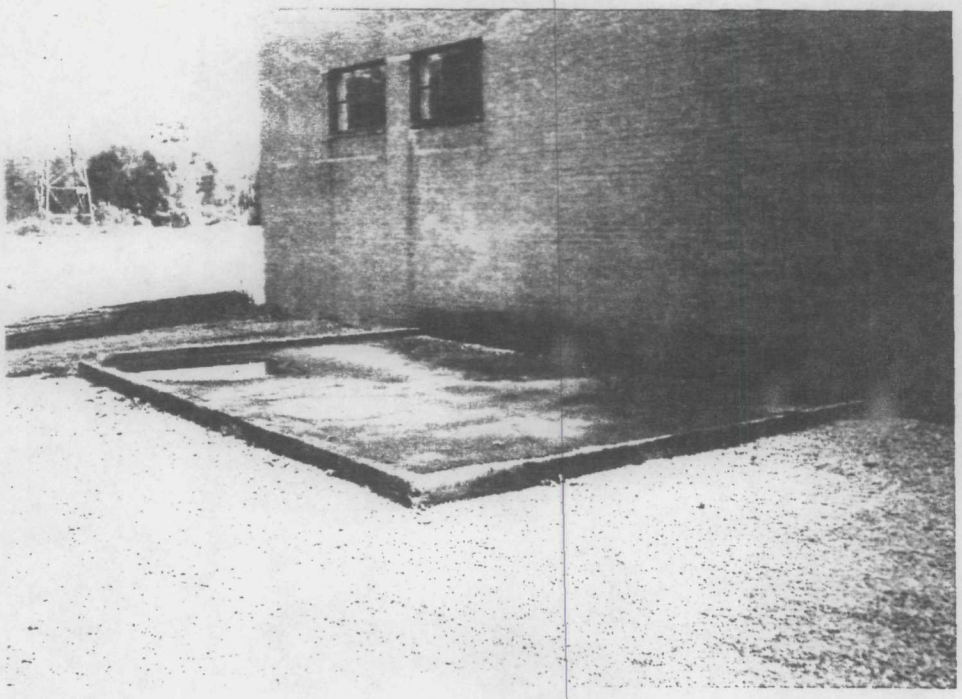
Photograph No. 5
Orientation: East
Description: This photograph shows the metal plates covering the coolant trench.

Location: SWMU 1
Date: September 30, 1991



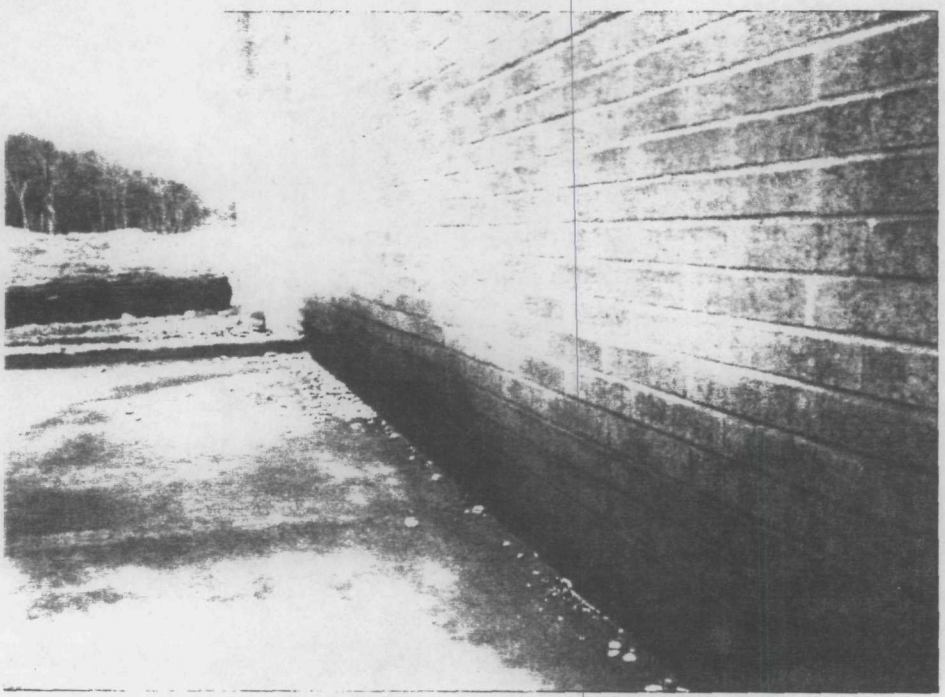
Photograph No. 6
Orientation: Northeast
Description: This photograph shows the concrete oil-drip pad.

Location: SWMU 2
Date: September 30, 1991



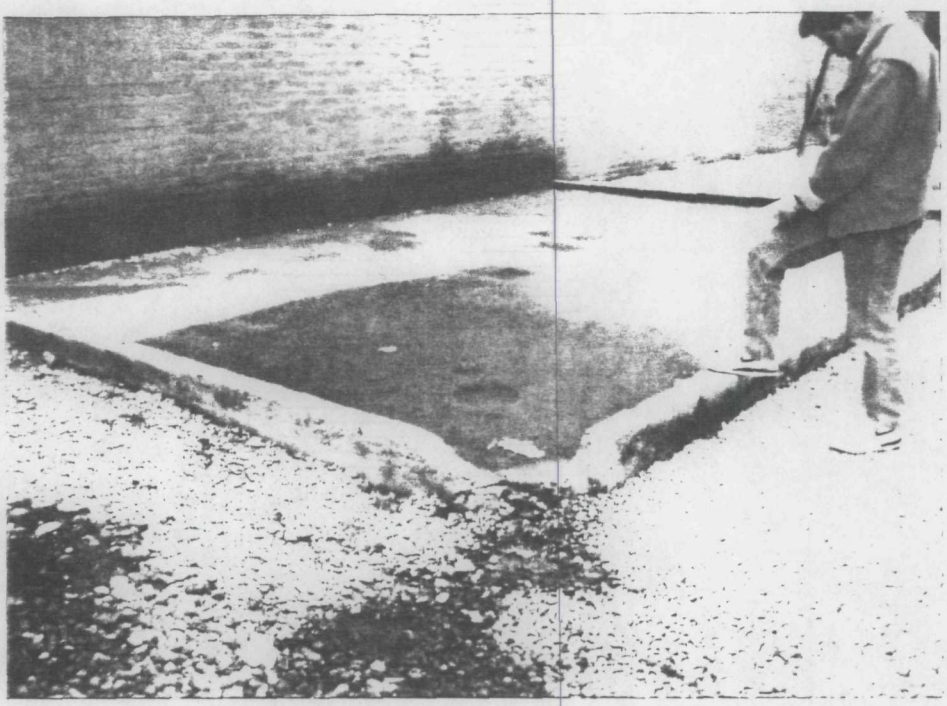
Photograph No. 7
Orientation: Northeast
Description: This photograph shows the concrete oil-drip pad.

Location: SWMU 2
Date: September 30, 1991



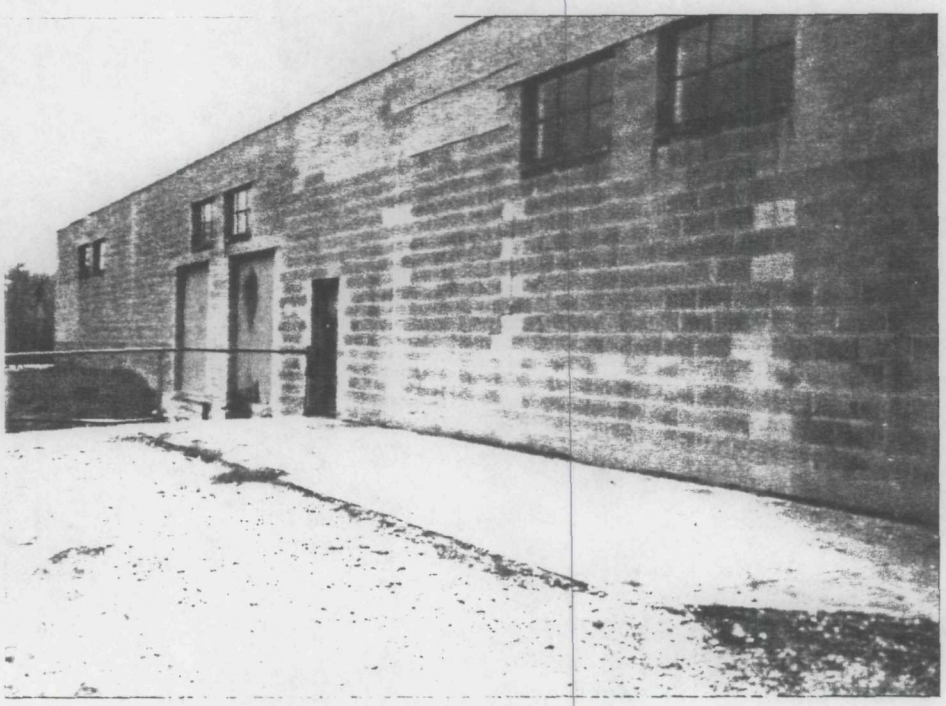
Photograph No. 8
Orientation: North
Description: This photograph shows drip pad abutting the warehouse wall. Notice that there is not a gap between the wall and the storage pad.

Location: SWMU 2
Date: April 20, 1992



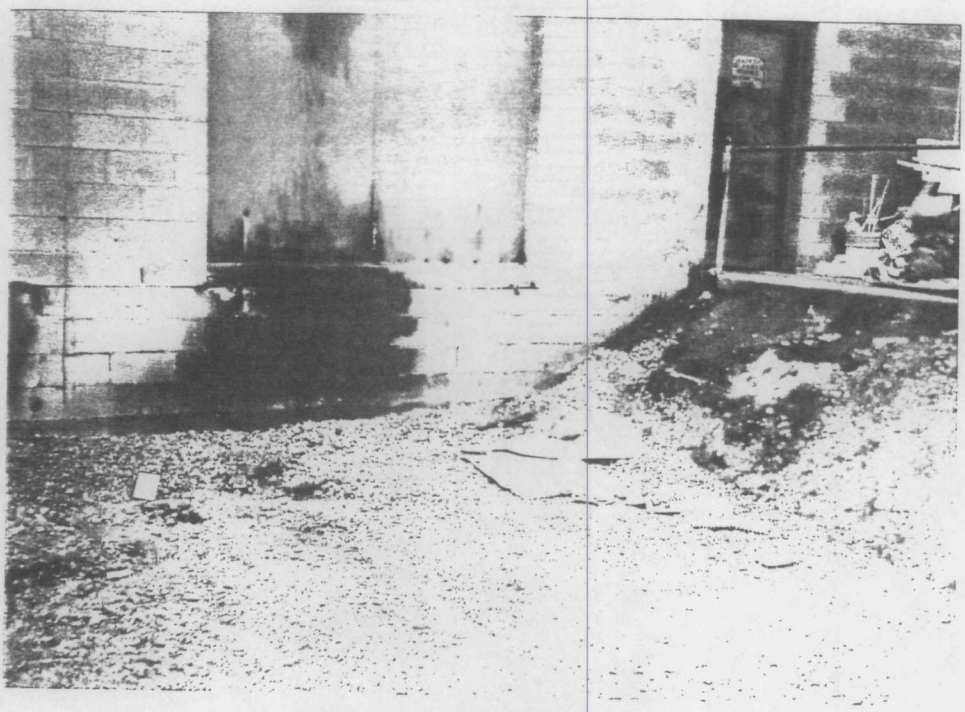
Photograph No. 9
Orientation: Southeast
Description: This photograph shows the break in the berm in the northwest corner of the pad. Note stained gravel and soil outside the pad.

Location: SWMU 2
Date: April 20, 1992



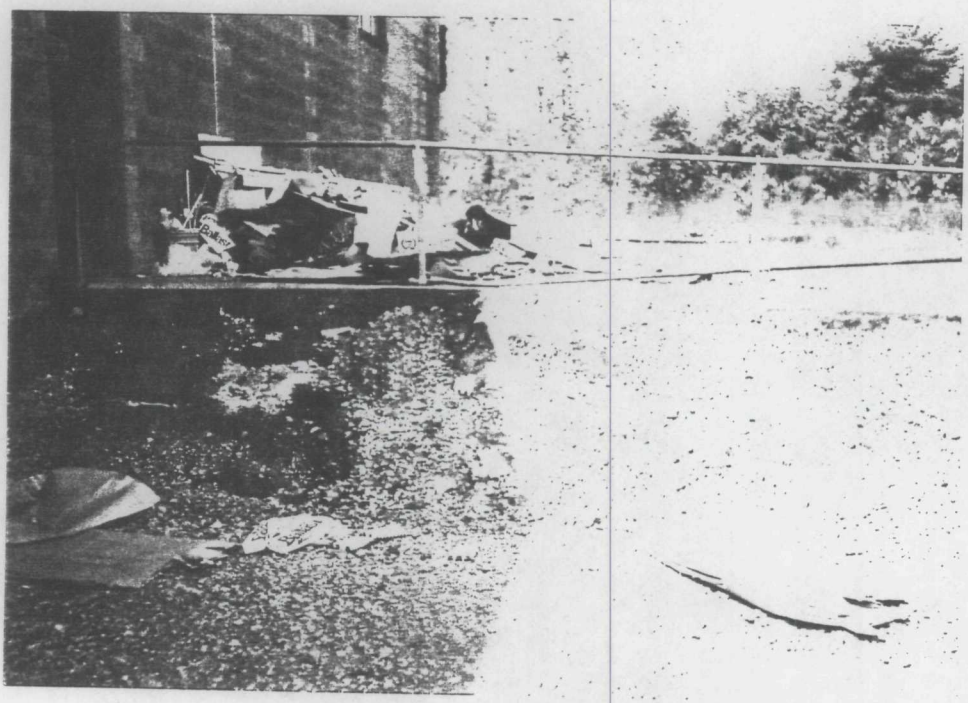
Photograph No. 10
Orientation: East
Description: This photograph shows drum storage pad on the north side of the warehouse.

Location: SWMU 3
Date: April 20, 1992



Photograph No. 11
Orientation: South
Description: This photograph shows the loading dock and sump.

Location: AOC 1
Date: September 30, 1991



Photograph No. 12
Orientation: West
Description: This photograph shows the loading dock.

Location: AOC 1
Date: September 30, 1991

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

28

9:30 A.M Buckeye Forge TMB

Tom Leach
Steve Trachsel

Met with Larry BRANDOM [redacted]

Discussed purpose of VSI
There was some confusion
on the proper ID #.

Called OEPA. Paul Anderson,
he said the ID
pertains to 71ST location
that was vacated by
Buckeye Forge in 1989.

Mr. ~~Tom~~ Lou Virag

29

Met EXCEL TUBE MFG. TMB
with Brian Funaro
@ 11:15 Milan Lucka
@. 5171 E 71ST
Warehouse with 2
sections. Empty now.

32,000 square feet total

Trench around the
walls contained a
dark oily liquid,
leading to a sump
on VST. One appx
6 x 3 ft about 6 ft
deep.
Photo 1 & 2 looking
South. 4,5
Photo 3 looking east
Possibly a degreaser

Warehouse has concrete floor.

Outside the facility:
Parking lot, gravel & dirt field. ~~[illegible]~~ On West side of bldg. Concrete pad 15 x 20 ft looks like form tank or drum pad.
Some black staining on brick wall.
North side.
Loading Dock with sump or sewer outlet. Slight oil sheen on water.
Loading dock walls had some black staining.

To North is empty field with transmission line towers.
East of RR tracks.

East side of bldg.
at base of wall appears to have some oil leaks.
Approx 3 ft long section stained at the base.

To the east is a field about 60 yards and then Ohio Power

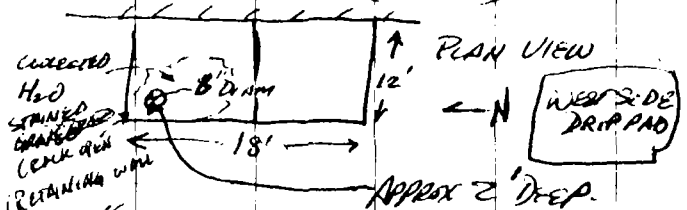
Corner of 71st and Canal

BUCKEYE FORGE FACILITY (12)

PARTLY SUNNY. MID 70's BREEZY. 4/20/92

13:50 TOM SINSKE & SHAHIB MAHMUD ARRIVE ON SITE - AT BUCKEYE FORGE. NO ONE WAS PRESENT AT THE FACILITY. T.S & S.M. RE-INSPECT SUMMIT AREA.

PHOTO 6 & 7 - DRIP PAD AT BUCKEYE FORGE FACILITY (BFF).



8' DIAM HOLE ON WEST SIDE OF PAD

THE DRIP PAD IS LOCATED THE WEST SIDE OF BLDG

PHOTO #8. BLDG WALL & DRIP PAD STAINING ON WALL.

PHOTO #9. BROKEN CORNER OF DRIP PAD W/ STAINING PRESENT

SM 4/21/92

(13)

4/20/92

ON ADJACENT GRAVEL.

SIDE VIEW

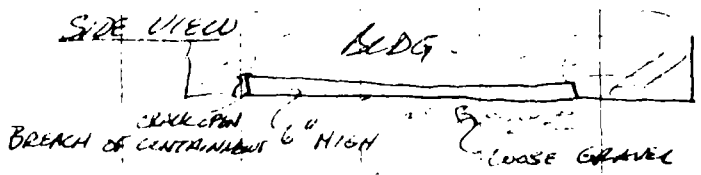
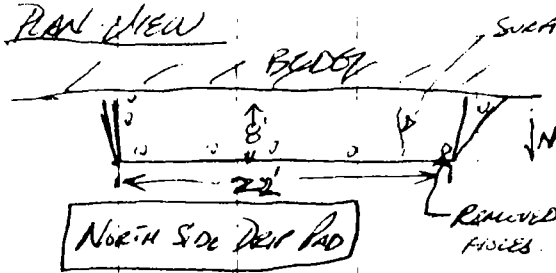


PHOTO 10 & 11. CONCRETE PAD NORTH OF BLDG. - SURFACE CRACKS NOTED. FENCE POST POLES HAVE BEEN REMOVED

PLAN VIEW



CRACKS ON PAD PRIMARILY SURFICIAL.

TOM SINSKE INSPECTS OUTER PERIMETER OF FACILITY. @ 320' APPEARS TO BE A DRAINAGE AREA WHICH IS 2-3' LOWER IN ELEVATION THAN

4/20/92 SM

(14) SAM 4/20/92

SURROUNDING AREA - CONTAINS WATER.
WATER IS BRN + RUSTY IN COLOR.
SURROUNDING LAND CONTAINS ALOT OF ROOFING SHINGLES.
~140' N OF NORTH SIDE DRIP PAD.
A NO DUMPING SIGN POSTED BY THE LOCAL POLICE - ASSUMPTION MADE TO BE FACILITY BOUNDRY LINE.
DEER TRACKS WERE NOTED NORTH PASS THE POSTED SIGN.
14.22 TOM S. + SHARIB MAHMUD CONCLUDED SITE INSPECTION -
14.23 OFF-SITE.

SAM 4/20/92

(15)

LOUIS J. BACCI RECREATIONAL PARK EAST OF THE BUCKEYE FORGE FACILITY.
A VACANT SLAG IS LOCATED ON THE WEST SIDE OF THE FACILITY.

SAM 4/20/92

ATTACHMENT D

FILE INFORMATION OBTAINED DURING THE PA

OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171

File

Toward A Cleaner Environment

Richard F. Celeste
Governor

December 20, 1988

RE: BUCKEYE FORGE -
OHD 017 721 754
CUYAHOGA COUNTY
GENERATOR

Mr. Larry Branum
Buckeye Forge
5171 East 71st Street
Cleveland, Ohio 44125

Dear Mr. Branum:

Thank you for your time and cooperation during my inspection of Buckeye Forge, 5171 East 71st Street on December 9, 1988. At the inspection, Buckeye Forge was represented by Robert Stasck and you. Ohio EPA was represented by Kay Springer and me.

At the inspection we discussed the products used and the wastes generated. At this time, Buckeye Forge uses oils for machining and a water soluble oil for cleaning parts. The waste oils from these processes are shipped to Research Oil as a nonhazardous waste.

If any new wastes are generated at this facility, Buckeye Forge should call Ohio EPA to discuss the proper handling and disposal of the waste. At this time, no hazardous waste are generated at this facility.

If you have any questions, please give me a call. Thanks for your time.

Sincerely,

Teresa Sabol
Environmental Engineer
Division of Solid & Hazardous Waste Management

TS:mo

cc: D. Berg, DSHWM, NEDO
D. Sholtis, DSHWM, CO

12/9/88 9:00
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 017721754

GENERAL INFORMATION

U.S. EPA I.D. # OHD044627754

Facility: Buckeye Forge Address: 5171 E. 71st Street City: Cleveland

State: Ohio Zip Code: 44125 County: Cuyahoga Telephone: 216-641-6533

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Larry Branom	Quality Control Manager	216-641-6533
2.	Robert Staseck	Plant Manager	216-641-6533
3.	Tom Collier		216-641-6533 x30

INSPECTOR(S)

1.	Teresa Sabol	Environmental Engineer	216-425-9171
2.	Kay Springer	Environmental Engineer	216-425-9171
3.			

INSTALLATION ACTIVITY

Mark One

- [x] Generator only (G)
- [ ] Transporter (T)
- [ ] TSDF only
- [ ] G-T
- [ ] G-TSDF
- [ ] T-TSDF
- [ ] G-T-TSDF

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- [ ] General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure
- [ ] Containers S01
- [ ] Tanks S02/T01
- [ ] Surface Impoundments S04/T02
- [ ] Incineration/Thermal Treatment
- [ ] Waste Piles S03
- [ ] Land Treatment D81
- [ ] Landfills D80
- [ ] Chemical/Physical/Biological T04
- [ ] Groundwater Monitoring
- [ ] Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	—	—	✓	—
2. If "yes", is it complete and accurate?	—	—	✓	—
3. Has the facility submitted a Part B?	—	—	✓	—
4. Was advance notice of the inspection given? If so, how far in advance?	✓	—	—	1 week

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

No hazardous waste generated!

Buckeye Forge - E. 71st 12/9/88

Larry Barnum, Buckeye Forge
Robert Stack, Buckeye Forge
Kay Springer, Ohio EPA
Teresa Saboi, Ohio EPA
Dan Cesarelli, Buckeye Forge

Machining shop

Products used
machine lubricants
tapping oils
water-soluble oil for cleaning parts

All wastes are non-hazardous and they are sent to Research Oil

Shavings from machining sent to scrap yard

no acids used.

5171 E 71 St
Cuyahoga Heights

Cuyahoga
Gulf & West.
02-04-045-2
RECEIVED
OHIO EPA
Diff. C

BUCKEYE FORGE, Inc.

5171 East 71st Street • Cleveland, Ohio 44125 • Phone: 216/641-6533

JAN 24 1985

DIV. of SOLID & HAZ. WASTE MGT.

January 2, 1985

United States Environmental
Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Attention: SHW-13

OHD017721754 G, PA-9

Gentlemen:

We are in receipt of your December 17, 1984 correspondence (copy attached). After careful review of 40CFR Part 261.5, it is Buckeye Forge's determination that we qualify as a "small quantity generator" (generates less than 1000 kilograms of hazardous waste in a month). For this reason, we request that our request of February 2, 1981 be withdrawn and that we be granted "small quantity generator" status.

Yours very truly,

Jeffrey P. Pialet
Vice President/General Manager

JPP/cck

encls:

RECEIVED
JAN 1 1985
WMD-RAIU
EPA, REGION

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

DEC 17 1984

REPLY TO ATTENTION OF:
5HW-13

John R. Williams, Employee Relations Manager
Gulf & Western Manufacturing Company
5171 East 71st Street
Cleveland, Ohio 44125

RE: Request for Information--Withdrawal of Part A
FACILITY NAME: Gulf & Western Mfg., Co-Buckeye Forge
U.S. EPA ID NO.: OHD017721754

Dear Mr. Williams:

In a letter dated September 2, 1982, the United States Environmental Protection Agency Region V, requested you to submit additional information to support your request of February 2, 1981 for withdrawal of your hazardous waste permit application. A response to our letter was due on October 2, 1982. Since we have not yet received the additional information requested, our records will continue to show the above facility as a regulated hazardous waste management facility subject to the Resource Conservation and Recovery Act, as amended (RCRA), and regulations promulgated thereunder.

Based on the information that was submitted, your facility appears to qualify as a small quantity generator as defined in 40 CFR Part 261.5 (enclosed). Please review these requirements to verify that your facility qualifies as a small quantity generator. If it does, and a permit is not required, please submit your determination in writing, signed and certified by an authorized person in accordance with 40 CFR Part 270.11 (enclosed), requesting that your application be withdrawn. If at any time since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

If your review indicates that a permit is required, but certain information on your application is incorrect, please submit a revised Part A with the appropriate changes to this Regional Office. We will assume your facility requires a permit, if no response is received in this office within 30 days. Accordingly, we will continue to process your application.

Please contact the Regulatory Analysis and Information Unit at (312) 886-6148 for assistance, if you have any questions. Please refer to "Request for Information--Withdrawal of Part A," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures